

TO: JAMES J. WALDRON, CLERK

CASE NO. 08-14631 (GMB)

ADV. NO. 10-01377 (GMB)

IN RE: Shapes/Arch Holdings, L.L.C., *et al.*  
(Jointly Administered)  
The Class 10 Liquidation Trust v.  
Northeast Metal Traders, Inc.

CHAPTER 11

**INFORMATION FOR NOTICE OF SETTLEMENT OF CONTROVERSY**

The Class 10 Liquidation Trust (the "Class 10 Trust") proposes to settle a claim and/or action, the nature of which is described below.

If any creditor or other party in interest has an objection to the settlement, an objection and request for a hearing on such objection shall be in writing, served upon the Class 10 Trust's counsel and filed with the Clerk of the United States Bankruptcy Court.

Such objection and request shall be filed with the Clerk and served upon the Class 10 Trust's counsel no later than January 24, 2012.

In the event an objection is timely filed, a hearing thereon will be held on January 31, 2012, at 10:00 a.m., before the Honorable Gloria M. Burns, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101.

If no objection is filed with the Clerk and served upon the person named below on or before January 24, 2012, the settlement will be consummated without further notice.

The nature of the action and the terms of the settlement are as follows:

NATURE OF ACTION	PERTINENT TERMS OF THE SETTLEMENT
On March 11, 2010, the Class 10 Trust filed a complaint against Northeast Metal Traders, Inc. (the "Defendant") seeking recovery of \$1,767,249.23 in transfers made by one or more of the Debtors to the Defendant during the 90-day period preceding the Debtors' Chapter 11 filings under 11 U.S.C. §547 and under 11 U.S.C. §§ 544 and 548.	Defendant and the Class 10 Trust have entered into a settlement agreement resolving the complaint. Pursuant to the settlement agreement, Defendant has agreed to make payment to the Class 10 Trust in the amount of \$260,000.00 (the "Settlement Amount") and to waive any and all claims against the Estate, including proof of claim no. 488 in addition to their 11 U.S.C. § 502(h) claim, in full satisfaction of any avoidance claims the Class 10 Trust has or might have against Defendant. The complaint shall be dismissed with prejudice upon indefeasible payment of the Settlement Amount by the Defendant.

Requests for additional information about the nature of the action or the terms of the settlement should be directed to either of:

NAME: Felice R. Yudkin, Esq.  
ADDRESS: Cole, Schotz, Meisel,  
Forman & Leonard, P.A.  
Court Plaza North  
25 Main Street  
Hackensack, New Jersey 07601

Donna H. Lieberman, Esq.  
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555 Madison Avenue  
9<sup>th</sup> Floor  
New York, NY 10022

TELEPHONE NO: (201) 489-3000

(212) 765-9100

SUBMITTED BY: /s/ Felice R. Yudkin

POSITION: Co-counsel for the  
Class 10 Trust's

DATED: January 10, 2012

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TYPE OF TASK: 11

FORM # BL STATEMENT 11S

NJ LOCAL FORM 10